

United States District Court

FEB 21 2018

SOUTHERN

DISTRICT OF

TEXAS

McALLEN DIVISION

David J. Bradley, Clerk

UNITED STATES OF AMERICA

V.

CRIMINAL COMPLAINT

Gaudencia Trejo-Lugo

Principal

Case Number:

YOB: 1976

Mexico

M-18- 0377-M

(Name and Address of Defendant)

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about February 20, 2018 in Hidalgo County, in the Southern District of Texas defendants(s) did,

knowing or in reckless disregard of the fact that Miguel Antonio Lopez-Ramirez and Jhonier Josue Dominguez-Castro, both citizens and nationals of Honduras, along with five (5) other undocumented aliens, for a total of seven (7), who had entered the United States in violation of law, concealed, harbored or shielded from detection or attempt to conceal, harbor, or shield from detection such aliens in any place, including any building or means of transportation, to wit: a residence located near Donna, Texas,

in violation of Title 8 United States Code, Section(s) 1324(a)(1)(A)(iii) FELONY

I further state that I am a(n) U.S. Senior Border Patrol Agent and that this complaint is based on the following facts:

On February 7, 2018, Border Patrol Agents received information about a house used to harbor undocumented aliens located at 945 Anderson Rd. trailer #4 in Donna, Texas. The information also indicated that the female caretaker drives a white Ford Expedition.

Agents conducted surveillance at the suspected stash house periodically from February 15, 2018 to February 20, 2018. During the surveillance, agents observed a female subject exit the neighboring trailer house #5 and entering trailer #4 several times.

SEE ATTACHED

Continued on the attached sheet and made a part of this complaint:

☒ Yes ☐ No

approved by
[Signature]

[Signature]

Signature of Complainant

Julio C. Peña

Senior Patrol Agent

Printed Name of Complainant

Sworn to before me and subscribed in my presence,

February 21, 2018

Date

4:03 pm

at

McAllen, Texas

City and State

Peter E. Ormsby

U. S. Magistrate Judge

Name and Title of Judicial Officer

[Signature]
Signature of Judicial Officer

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

ATTACHMENT TO CRIMINAL COMPLAINT:

M-18-0377-M

RE: Gaudencia Trejo-Lugo

CONTINUATION:

On February 20, 2018, agents observed the same female subject depart from trailer #5 in a Jeep Compass. Agents proceeded to follow the vehicle and contacted Hidalgo County Constables Office (HCCO) to assist with a vehicle stop. HCCO Deputies conducted a traffic stop on the Jeep for following too closely. Agents approached the female driver and identified themselves as border patrol agents. The female driver was questioned as to her suspected involvement in human smuggling to which she stated she was not involved and was only the baby sitter for the owner of trailer #4. The baby sitter provided agents with consent to search her trailer home (trailer #5). Agents along with HCCO Deputies proceeded to trailer #5, however no undocumented aliens were discovered. As agents were exiting the trailer home, the baby sitter expressed concern to agents that the child she babysits might be alone inside trailer #4. At this time the baby sitter entered trailer #4 and exited with the child and informed agents that there were several suspected undocumented aliens inside.

At this time, agents approached the open door, identified themselves as border patrol agents, and asked the subjects to exit the trailer house. Miguel Antonio Lopez-Ramirez, Jhonier Josue Dominguez-Castro, and five additional subjects exited the trailer and all were determined to be illegally present in the United States.

Shortly thereafter, the Ford Expedition driven by a female subject, later identified as Gaudencia Trejo-Lugo, was observed arriving at the location. Trejo was questioned by agents as to her suspected involvement in human smuggling to which she indicated to harboring illegal aliens at her trailer home. At this time, agents conducted an immigration inspection of Trejo and she was determined to be illegally present in the United States. Trejo was read her Miranda Rights and provided consent to search her trailer home. Agents proceeded to enter the trailer home, however no additional undocumented aliens were found.

Trejo was placed under arrest along with the seven undocumented aliens and transported to the Centralized Processing Center to be processed accordingly.

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF TEXAS
McALLEN, TEXAS**

ATTACHMENT TO CRIMINAL COMPLAINT:

M-18-0377-M

RE: Gaudencia Trejo-Lugo

CONTINUATION:

PRINCIPAL STATEMENT:

Gaudencia Trejo-Lugo was read her Miranda Rights. She understood her rights and agreed to provide a sworn statement without an attorney present.

Trejo admitted to using her trailer home to harbor undocumented aliens. She claims to have been harboring illegal aliens for the past month and would receive \$100 per alien. Trejo stated she would provide food and instruct the aliens not to go outside or make noise. Trejo indicated she has harbored approximately 14 to 15 illegal aliens in total.

MATERIAL WITNESSES STATEMENTS:

Miguel Antonio Lopez-Ramirez and Jhonier Josue Dominguez-Castro were read their Miranda Rights. Both understood their rights and agreed to provide a sworn statement without the presence of an attorney.

Lopez, a citizen of Honduras, stated he made the smuggling arrangements and paid \$4,000 USD. After crossing the river, Lopez stated he was picked up and eventually transported to the house where he was later arrested. Lopez indicated the caretaker arrived in a white SUV and provided food for them to cook.

Lopez identified Trejo, through a photo lineup as the caretaker and owner of the house.

Dominguez, a citizen of Honduras, stated he made the smuggling arrangements and was to pay \$8,500 USD. After crossing the river, Dominguez stated he was eventually transported to a trailer where he was later arrested. Dominguez stated when he arrived at the trailer a lady there told him to get comfortable and that eventually someone was going to take him further north. Dominguez further stated the lady instructed him not to look out the windows or go outside.

Dominguez identified Trejo, through a photo lineup, as the lady in charge of the house.